

EXHIBIT

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Declaration of Peter C. Salerno
In Opposition to Plaintiffs' Motion to Compel
Against Yassin Abdullah Kadi

03 MDL 1570

January 2018



Peter Salerno <peter.salerno.law@gmail.com>

Re: 9th and final production

1 message

Peter Salerno <peter.salerno.law@gmail.com> Tue, Apr 18, 2017 at 10:25 AM
To: "Andrew J. Maloney" <AMaloney@kreindler.com>
Cc: "Carter, Sean" <scarter1@cozen.com>, "Christopher R. LoPalo" <clopalo@napolilaw.com>, "Jerry S. Goldman" <jgoldman@andersonkill.com>, Jim Kreindler <JKreindler@kreindler.com>, zRobert Haefele <rhaefe@motleyrice.com>, zScott Tarbutton <starbutton@cozen.com>, Amy Rothstein <amyrothsteinlaw@gmail.com>

Andrew et al.:

We had a pleasant Easter, Andrew, and hope you and your family and colleagues did as well.

Attached is our chart cross-referencing our ninth production with your discovery requests, in both .pdf and Excel formats. As a reminder, as noted in our letter of August 7, 2015 (p. 1), we are treating the items of your second request as attachments to the first for coding purposes.

In the course of our document review we decided to re-produce without redactions 83 documents that had been produced with redactions. A second chart, also in both .pdf and Excel formats, is attached cross-referencing the new versions with the old.

We are not withholding any documents pursuant to any objection to either your first or second requests on any ground other than privilege or work product protection. We have attempted to produce every document in our client's possession, custody or control that is responsive to your requests. In due course we will provide a privilege log. Our current production contains some documents that we had previously withheld and listed on our December 2014 privilege log.

We expect to provide a supplement to our August 7, 2015 letter, which responded to yours of May 6, 2015, next week.

Please do not hesitate to let us know if you have any questions.

Regards, Peter

Peter C. Salerno
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On Mon, Apr 17, 2017 at 1:20 PM, Andrew J. Maloney <AMaloney@kreindler.com> wrote:

Peter,

Hope you had a relaxing Easter. Can you let us know when we might expect the cross-reference of Bates numbers to our document requests and the letter detailing your responses and referenced in my May 6, 2015 letter.

Regards,

Andrew Maloney

From: Peter Salerno [mailto:peter.salerno.law@gmail.com]
Sent: Friday, March 31, 2017 11:16 AM
To: Andrew J. Maloney <AMaloney@kreindler.com>; Carter, Sean <scarter1@cozen.com>; Christopher R. LoPalo <clopalo@napolilaw.com>; Jerry S. Goldman <jgoldman@andersonkill.com>; Jim Kreindler <JKreindler@kreindler.com>; zRobert Haefele <rhaefele@motleyrice.com>; zScott Tarbutton <starbutton@cozen.com>
Subject: 9th and final production

Dear Counsel:

Our 9th and final production will be provided to Bob Haefele by our vendor early next week. Amy and I are going on vacation for a week beginning today, returning Saturday April 8. We will send you our customary cross-reference of Bates numbers to document requests upon our return, as well as a letter outlining in more detail what we have done in response to your document requests and Andrew Maloney's May 6, 2015 letter. We will have access to email, so if you have any urgent questions feel free to pose them.

Regards,

Peter

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4 attachments

 **Kadi 9th Production-Request Number cross-reference.pdf**
3663K

 **Kadi 9th Production-Request Number cross-reference.xlsxm**
1369K

 **Kadi 9th Production-83 re-produced documents cross-reference.xlsx**
14K

 **Kadi 9th Production-83 re-produced documents cross-reference.pdf**
21K